

**CABOT CORPORATION**

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August 12, 1974

Mr. A. H. Manzardo
U.S. Environmental Protection Agency
Region V
1 North Wacker Drive
Chicago, Illinois 60606

EPA Region 5 Records Ctr.



298921

Dear Mr. Manzardo:

Permit No. IL 0004367
Application No. IL 0720YE 2 000712
Illinois Environmental Protection Agency #Log NPDES 55-72
Cabot Corporation, Tuscola, Illinois

We have received and examined the draft copy of the subject permit. We understand that the draft permit will be modified prior to going to public notice, but there are several minor points which we felt should be called to your attention and clarified.

1. On page 8, attachment II, of the fact sheet, it is stated that treatment consists of acid neutralization and settling. This statement is true when it is applied to the entire plant, but not when it is limited to that portion of the plant which comprises of 001 outfall. No neutralization or settling occurs in the 001 outfall because it is not required. We are presently meeting the indicated levels of pH and suspended solids.
2. The water intake is from a commercial firm, Industrial Water Supply, not the city of Tuscola.
3. No process or cooling water is included in the 001 outfall. This outfall is made up entirely of water from the Nash pump seals, a small amount from the sanitary system and from storm and surface drainage as indicated in Mr. Curt Beck's letter of May 31, 1974 to Mr. Jay Goldstein. All process and cooling water is discharged into our deep disposal well. We have recently isolated and begun a sampling program on the Nash pump seal water, and this stream could be separated from non-process discharges at our 001 outfall, if it is the intention of the Agency to establish effluent limitations on this stream.

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4. If the 001 discharge point remains, in the revised permit, essentially as it is in this copy, we will make application to the Illinois EPA for the exemption under Rule 404 (f) (ii) of the Illinois Pollution Control Board Rules and Regulations, Chapter 3. We feel that we qualify for the exemption because:
- (A) The effluent does not, alone or in combination with other sources, cause a violation of any applicable water quality standard.
 - (B) The effluent does not, alone or in combination with other sources, cause dissolved oxygen in the waters of the State to fall below 6.0 mg/l during at least 16 hours of any 24 hour period, or below 5.0 mg/l at any time.
 - (C) Whereas, as indicated on the fact sheet, page 8, attachment II, our average discharge at present is 14 mg/l BOD₅ and 9 mg/l suspended solids and we are operating under Illinois EPA Permit number 1973-EA-506-OP, we have applied for and received Illinois EPA Permit number 1974-FA-1062 to construct a new aerobic treatment plant. When this plant is completed, later this fall, its effluent will not exceed 10 mg/l BOD₅ or 12 mg/l of suspended solids. (It will actually meet 4 mg/l BOD₅ and 5 mg/l suspended solids as indicated under Section II, 4a of the permit application.)
 - (D) The above program is our program for achieving compliance, since the outfall from the treatment plant will be diluted further by waters from the Nash pump seals, which themselves exhibit no BOD₅ ~~or~~ suspended solids.
 - (E) The agency has agreed that the above permit and its construction schedule will be sufficient to place us in BOD₅ compliance, and we are already in compliance with regard to pH, suspended solids and dissolved solids.

AND VERY LITTLE

We felt that these comments might be of assistance to you and your staff in your efforts to formulate the conditions of our NPDES permit and, if you like, we can meet with them to discuss these more fully.

Sincerely yours,

CABOT CORPORATION



Dr. Donald J. Robinson
Corporate Environmental Control

DJR:ib

August 12, 1974

cc: Mr. William H. Bosch
Illinois Environmental Protection Agency
Permits Services
2200 Churchill Road
Springfield, Illinois 62706